IN THE UNITED STATES DISTRICT COURT

FOR THE NORTHERN DISTRICT OF OHIO

EASTERN DIVISION

UNITED STATES OF AMERICA,	)	CIVIL ACTION NO
Plaintiff,	)	JUDGE
v.	)	
$75,000.00 IN U.S. CURRENCY,	)	
$29,347.05 SEIZED FROM CANTON SCHOOL EMPLOYEE'S FEDERAL CREDIT UNION ACCOUNT NUMBER 162248 IN THE NAME OF GARY WINN AND LORETHA WINN;	)	
$8,531.91 SEIZED FROM CANTON SCHOOL EMPLOYEE'S FEDERAL CREDIT UNION ACCOUNT NUMBER 343382 IN THE NAME GARY WINN AND/OR CURTIS DANSBY AND/OR C AND G LOGISTICS LLC;	)	
$16,730.41 SEIZED FROM CANTON SCHOOL EMPLOYEE'S FEDERAL CREDIT UNION ACCOUNT NUMBER 105193 IN THE NAME OF LORETHA AND RADLEY WINN, and	)	
2010 MERCEDES CLS550, VIN: WDDDJ7CB5AA162115,	)	COMPLAINT IN FORFEITURE
Defendants.	)	

NOW COMES plaintiff, the United States of America, by David A. Sierleja, Acting United States Attorney for the Northern District of Ohio, and Phillip J. Tripi, Assistant U.S. Attorney, and files this Complaint in Forfeiture, alleging on information and belief the following:

JURISDICTION AND INTRODUCTION

1. This Court has jurisdiction over this in rem proceeding pursuant to 28 U.S.C. §§ 1345 and 1355, 18 U.S.C. § 981, and 21 U.S.C. § 881.

2. This Court has venue in this matter pursuant to 28 U.S.C. § 1395.

3. Defendants $75,000.00 in U.S. Currency (hereinafter "defendant currency"), $29,347.05 Seized from Canton School Employee's Federal Credit Union Account Number 162248 in the Name of Gary Winn and Loretha Winn, $8,531.91 Seized from Canton School Employee's Federal Credit Union Account Number 343382 in the Name Gary Winn and/or Curtis Dansby and/or C and G Logistics LLC, $16,730.41 Seized from Canton School Employee's Federal Credit Union Account Number 105193 in the Name of Loretha and Radley Winn, and 2010 Mercedes CLS550, Vin: WDDDJ7CB5AA162115 (hereinafter "Defendant Mercedes") were seized on October 21, 2016, October 28, 2016, and November 4, 2016. All of the captioned defendants are hereinafter collectively referred to as the "defendant properties." Those defendant properties which are credit union accounts are collectively referred to as "defendant accounts." The funds in the defendant accounts and the other defendant properties are now in the possession of the federal government.

4. Subsequent to the seizure, the FBI commenced administrative forfeiture proceedings against the defendant properties. Claims were submitted in the administrative forfeiture proceeding to the defendant currency by Starlett M. Isles (hereinafter "Isles"), to the defendant accounts by the Canton School Employees Federal Credit Union (hereinafter "CSE Credit Union), and to defendant Mercedes by Ivory J. Vance (hereinafter "Vance"), necessitating the filing of this judicial forfeiture action.

5. The Defendant properties are subject to forfeiture to the United States pursuant to 21 U.S.C. § 881(a), because they constitute proceeds from drug trafficking activities and/or were used or intended to be used to facilitate drug trafficking in violation of 21 U.S.C. §§ 841(a) and 846, and pursuant to 18 U.S.C. § 981(a)(1)(A) because they were involved in a transaction or attempted transaction in violation of 18 U.S.C. § 1956.

FORFEITURE COUNT

6. In November of 2015, the FBI, Canton Police Department, the Stark County Safe Streets Task Force, and the Metro Drug Unit began a criminal investigation of drug trafficking activities of Gary Winn (hereinafter "Winn") and Curtis Dansby (hereinafter "Dansby").

7. Winn led a sophisticated drug trafficking operation (hereinafter "DTO") based in Canton, Ohio from at least September of 2014 through Winn's arrest on drug trafficking charges on October 13, 2016.

8. During this time period, the Winn DTO purchased multiple kilos of cocaine from a supplier in Houston, Texas.

9. Winn, Dansby, and coconspirators travelled by commercial airline to Houston, Texas to purchase cocaine and thereafter transported the purchased cocaine from Houston to Canton, Ohio, where it was sold in large amounts, including kilo level sales, in Ohio.

10. The Winn DTO stored large quantities of cocaine at a stash house on Wales Crossing, Canton, Ohio.

11. On September 8, 2014, Dansby and a coconspirator attempted to transport $100,000.00 in U.S. currency from Cleveland to Houston aboard a commercial airline.

12. Dansby and the coconspirator each transported $50,000.00 in U.S. currency in their carry-on luggage aboard the first leg of a flight from Cleveland Hopkin's International

Airport to Houston, Texas. The $100,000.00 was seized by law enforcement in Detroit, where Dansby and the coconspirator were encountered while attempting to board their connecting flight.

13. During November of 2014, Winn shipped three separate packages to an address in Texas, by means of a commercial parcel delivery service. One of the packages, shipped in late November, was intercepted by law enforcement and found to contain $29,000.00 in U.S. currency.

14. In December of 2014, Dansby purchased a kilo of cocaine which was shipped to him from Texas by a commercial parcel delivery service.

15. On December 8, 2015, Dansby shipped a package to an address in Houston, Texas, containing a stuffed animal that had hidden within it a vacuum-sealed bag containing $5,000.00 in U.S. currency.

16. In August of 2016, Dansby was known to be offering to sell large quantities of cocaine in the Northern District of Ohio for $36,000.00 per kilo.

17. On October 13, 2016, Winn and Dansby met with a known drug trafficker in Houston, Texas and paid him $830,000.00 for the purchase of approximately 39 kilograms of cocaine.

18. Charles Nichols (hereinafter "Nichols") was a major customer of, and made significant purchases of cocaine from, the Winn DTO.

19. In September and October of 2016, Winn met on multiple occasions with Nichols for the purpose of conducting drug transactions.

20. During 2016, Nichols paid approximately $600,000.00 to Winn for the purchase of cocaine.

21. On October 21, 2016, the FBI executed a search warrant at Nichols' residence. Nichols arrived at the scene of the search driving the defendant Mercedes.

22. When interviewed by law enforcement officers, Nichols admitted he was a drug dealer and had purchased the Mercedes with the proceeds of his drug trafficking activities.

23. Nichols stated he was the true owner of defendant Mercedes and had asked Ivory J. Vance to place the vehicle in Vance's name to avoid law enforcement detection and potential seizure of the vehicle.

24. Winn concealed the nature, source, location, ownership, and control of the proceeds of his DTO by opening or utilizing defendant accounts in various names at CSE,Credit Union, including joint account no. 162248 in the names of Winn and his mother, Loretha Winn; joint account no. 343382 in the names of Winn, Dansby and/or C and G Logistics LLC (hereinafter "C&G"), and joint account no. 105193 in the names of Loretha and Radley Winn,

25. Between January of 2014 and August of 2016, Winn made, or caused to be made, large cash deposits into defendant accounts totaling approximately $277,000.

26. On July 6, 2015, Winn incorporated C&G to further conceal the nature, source, location, ownership, and control of the proceeds of his DTO.

27. C&G represents itself to be a trucking company that hauls loads in semi-trucks and receives payments for services via check from other trucking companies. C&G does not receive large payments of cash from its customers nor does it directly pay for major purchases in cash.

29. An analysis of C&G business records establishes that C&G's operations are funded significantly through multiple cash deposits into its business account, totaling approximately $123,500.00, which deposits correspond with large purchases made by C&G and

cannot be traced back to any legitimate business revenue. The joint business account was opened with an initial cash deposit of $24,375.00. On that same day, a cashier's check was drawn on the same account in the amount of $24,125.00 to fund a down payment of a semi tractor for C&G.

30. Winn laundered the proceeds of his DTO, in part, through the purchase of several motor vehicles and trailers titled in C&G's corporate name. Credit union records demonstrate the timing of large cash deposits usually corresponded with large C&G expenditures.

31. During the summer of 2016, Winn approached Isles and expressed an interest in purchasing a bar she owned. Winn told Isles he planned to place ownership of the bar and the liquor license in his mother's name.

32. Winn and Dansby brought Isles $75,000.00 in U.S. currency, banded together with rubber bands and vacuum-sealed in plastic, as a down payment for the bar and the liquor license.

33. The sale of the bar did not occur and on November 1, 2016, Isles was still in possession of the defendant currency she had received from Winn and Dansby.

34. By reason of the foregoing, Defendant properties are subject to forfeiture to the United States pursuant to the statutory authority set forth in paragraph 5 hereof.

WHEREFORE, plaintiff prays that this Court enter judgment condemning the defendant properties and forfeiting them to the United States of America for disposition according to law, and for such other relief as this Court may deem just and proper.

Respectfully submitted,

DAVID A. SIERLEJA
Acting United States Attorney

By: ______________________
Phillip J. Tripi
Reg. No. 0017767
United States Court House
801 West Superior Avenue, Suite 400
Cleveland, OH 44113
Phone: (216) 622-3769
Fax: (216)522-7499
Phillip.Tripi@usdoj.gov

VERIFICATION

STATE OF OHIO)
) SS.
COUNTY OF CUYAHOGA)

I, Phillip J. Tripi, being first duly sworn, depose and say that I am an Assistant United States Attorney for the Northern District of Ohio, and one of the attorneys for the Plaintiff in this action. Under penalty of perjury I depose and say the foregoing Complaint in Forfeiture is based upon information officially provided to me and is true as I verily believe.

Phillip J. Tripi
Assistant U.S. Attorney

Sworn to and subscribed in my presence this 3rd day of April, 2017.

Notary Public

NOTARIAL SEAL STATE OF OHIO
MELANIE KATE SANDS
Notary Public, State of Ohio
My Commission Expires May 6, 2020